Air Resources Board



Mary D. Nichols, Chairman 1001 I Street • P.O. Box 2815 Sacramento, California 95812 • www.arb.ca.gov



February 1, 2008

Mr. Wayne Nastri Regional Administrator Region 9 U.S. Environmental Protection Agency 75 Hawthorne Street San Francisco, California 94105

Dear Mr. Nastri:

I am writing to provide the U.S. Environmental Protection Agency (U.S. EPA) with additional technical information supporting the reasonable further progress (RFP) demonstrations for the South Coast and the San Joaquin Valley ozone State Implementations Plans (SIP). ARB submitted the South Coast and the San Joaquin Valley SIPs, including RFP demonstrations, on November 20, 2007 and November 28, 2007 respectively.

The additional information relates to the calculated benefits of the pre-1990 federal motor vehicle program in both RFP demonstrations. Under federal law, states cannot take credit for the benefits of the pre-1990 federal motor vehicle toward meeting RFP requirements. For the San Joaquin Valley, we also included vehicle activity data consistent with the SIP and transportation conformity budgets submitted in November but inadvertently left out of the RFP calculation.

Over the years, various methods have been used to estimate the benefits of the pre-1990 federal motor vehicle program. California used one approach in the SIPs submitted in November 2007. In the attached calculations, ARB used another method now preferred by U.S. EPA. By our accounting, the latest U.S. EPA method underestimates the progress that results from California's motor vehicle controls by overestimating the residual benefits of the pre-1990 federal motor vehicle program. Nevertheless, both the RFP calculations in the November submittals and the information provided here show the required progress.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: http://www.arb.ca.gov.

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We look forward to working with U.S. EPA to secure approval of California's ozone SIPs. If you have any questions, please feel free to contact me, at (916) 445-4383, or Ms. Lynn Terry, Deputy Executive Officer, at (916) 322-2739.

Sincerely,

/s/

James N. Goldstene Executive Officer

Enclosures

cc: See next page.

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cc: Dr. Deborah Jordan, Director
Air Division, Region 9
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105

Mr. Hasan Ikhrata Executive Director Southern California Association of Governments 818 W. Seventh Street, 12th Floor Los Angeles, California 90017

Dr. Barry Wallerstein
Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Mr. Seyed Sadredin
Executive Director/Air Pollution Control Officer
San Joaquin Valley Air Pollution Control District
1990 East Gettysburg Avenue
Fresno, California 93726

Ms. Barbara Goodwin
Executive Director
Council of Fresno County Governments
2035 Tulare Street, Suite 201
Fresno, California 93721

Mr. Ronald Brummett Executive Director Kern Council of Governments 1401 19th Street, Suite 300 Bakersfield, California 93301

Ms. Terri King
Executive Director
Kings County Association of Governments
339 West "D" Street, Suite B
Lemoore, California 93245

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Ms. Patricia Taylor
Executive Director
Madera County Transportation Commission
1816 Howard Road, Suite 8
Madera, California 93637

Mr. Jesse Brown Executive Director Merced County Association of Governments 369 West 18th Street Merced, California 95340

Mr. Andrew Chesley Executive Director San Joaquin Council of Governments 555 East Weber Avenue Stockton, California 95202

Mr. Vince Harris, Director Stanislaus Council of Governments 900 H Street, Suite D Modesto, California 95354

Mr. George Finney Executive Secretary Tulare County Association of Governments 5961 South Mooney Boulevard Visalia, California 93277

Ms. Lynn Terry Deputy Executive Officer Air Resources Board